No. 20-____ (Related to No. 20A98)

In the Supreme Court of the United States

MIKE KELLY, et al.,

Petitioners,

v.

COMMONWEALTH OF PENNSYLVANIA, et al.,

Respondents.

On Petition for A Writ of Certiorari to the Supreme Court of Pennsylvania

CERTIFICATE OF COMPLIANCE WITH WORD-COUNT LIMITATIONS

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I, Gregory H. Teufel, counsel for petitioners and a member of the Bar of this Court, certify that the Petition for a Writ of Certiorari in the above-captioned case contains 8,778 words, excluding the parts of the petition that are exempted by Rule 33.1(d).

December 11, 2020

Respectfully submitted,

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